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REMARKS

In response to the Office Action dated May 5, 2005 the Applicant has added new claims 39-50. Thus, Claims 25-44, remain pending in the application. Reconsideration of the claims, as amended, is respectfully requested.

Claims 25-38 were rejected under 35 U.S.C. §103(a) as being unpatentable over *Jalili* in view of *Mizoguchi*. The Official Action indicated that it would have been obvious to a person of ordinary skill in the art to use the sequencing of graphical images as disclosed by the *Mizoguchi* patent in the system of *Jalili*. One of ordinary skill in the art would have been motivated to do this to allow the display of decoy images.

Applicant respectfully points out that Section 206.02(j) of the *MPEP* holds that there are three necessarily elements to establish a *prima facie* case of obviousness as adopted from *In Re Vaeck*. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine the reference teachings. *In Re Vaeck*, 947 F.2d 488. It should be noted that when the invention is made by combining known components to achieve a new system, the prior art must provide a suggestion or motivation to make such a combination. See *Ruiz V.A. v. Chance Company*, 234 F.3d, 654, 665, 57 USPQ 2d 1161, 1167 (Fed. Cir. 2000); *ADT Corp. v. Lydall, Inc.*, F.3d 534, 546, 48 USPQ 2d 1321, 1329 (Fed. Cir. 1998); *Heidelberger Druckmaschinen AG v. Hantscho Commercial Products, Inc.*, 21 F.3d 1068, 1072, 30 USPQ 2d 1377, 1379 (Fed. Cir. 1994). Second, there must be a reasonable expectation of success. Finally, the prior art reference, or references when combined must teach or suggest all the claim limitations. The teaching or suggestion to make the claim combination in their reasonable expectation of success must both be found in the prior art and not based on the applicant's disclosure. *In Re Vaeck*, 947 F.2d 488.

Applicant agrees that the *Jalili* reference does not disclose the display of a sequence of graphical images. Furthermore, while the *Mizoguchi* reference describes the use of a sequence of graphical images, there

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is no suggestion for combining the system described in *Jalili* with *Mizoguchi* in either of the references. The Official Action has indicated that one of ordinary skill in the art would have been motivated to do this because this would allow the display of decoy images. Nothing in the *Jalili* reference or suggests that the use of a sequence of decoy images with the system of *Jalili* would be a possibility. Neither does *Mizoguchi* suggest that it would be useful within a system like that described in *Jalili*. Therefore, Applicant respectfully submits that the combination of the recited references is not suggested within either of the *Jalili* or *Mizoguchi* references and withdrawal of the rejection with respect to Claim 24, and all claims dependent therefrom, is respectfully requested. A Notice of Allowance for Claim 24 and all claims dependent therefrom is respectfully requested.

Applicant has also prepared new claims 39-44. New Claim 39 recites the steps of:

displaying a mappable graphic keypad image in a sequence of a plurality of mappable keypad images in a portion of a window display ... each of the icons having coordinates within the mappable graphic keypad image ...

determining the coordinates within the mappable graphic keypad image associated with a selected icon ...

transferring the coordinates within the mappable graphic keypad image associated with the selected icon to a processor;

These limitations are not disclosed within the combination of the *Jalili* and *Mizoguchi* references. Initially, Applicant notes that the Official Action has stated that the *Jalili* reference does not describe displaying a sequence of images and thus does not describe displaying a sequence of a plurality of mappable graphic keypad images as cited herein. Furthermore, while the *Mizoguchi* reference describes displaying an image window, the *Mizoguchi* reference does not describe displaying a mappable graphic keypad image in a portion of a window of a display device. The images displayed in the *Mizoguchi* reference comprise the entire display window.

Within the *Mizoguchi* reference when an image within the window is selected the coordinates

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associated with the display window are selected and provided. The Applicant's system, on the other hand, provides selecting an icon within the mappable graphic keypad image and determining the coordinates within the mappable graphic keypad image not within the window of the display device. By selecting and determining coordinates within the mappable graphic keypad image rather than in the window of the display device, a user's information is better protected. An unauthorized individual could intercept an entire display window being displayed and determine coordinates selected within the display window that are being selected thus providing information to an unauthorized individual monitoring transmissions between a client and server. The Applicant's method by determining coordinates associated with the mappable graphic keypad image rather than with the window of the display device makes the process of determining a particular icon selected within the mappable graphic keypad image much more difficult to discern for unauthorized individuals monitoring transmissions between a client and server devices.

Thus, the method described by Applicant's Claim 39 provides, according to the described limitations, protection from not only users attempting to visually detect a user's information, but additionally to protect from unauthorized users electronically trying to determine a user's information. The system described with respect to *Mizoguchi* is successful only with respect to the visual protection of a user's information. Therefore, the Applicant respectfully submits that Claim 39, and all claims dependent therefrom, are allowable over the art of record and a *Notice of Allowance* is respectfully requested.

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In view of the foregoing amendments and comments, the Applicant respectfully submits that all pending claims are allowable over the art of record and a Notice of Allowance is respectfully requested.

Respectfully submitted,
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